# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI SOUTHERN DIVISION

#### UNITED STATES OF AMERICA,

Plaintiff.

v.

(1) CHRISTINA E. GAUGER,

[DOB: 05-12-1981],

(2) ROBIN L. SELF, [DOB: 08-23-1982],

(3) PATRICK R. WATERS,

[DOB: 02-26-1987],

(4) JAMES L. BROWN,

[DOB: 07-23-1973],

(5) KEITH D. BUTCHEE,

[DOB: 12-16-1966],

(7) JASON L. THOMAS,

[DOB: 08-25-1977],

(8) JORDAN H. WILLIAMSON,

[DOB: 10-27-1988],

and

(9) BAYDON CHENNAULT,

[DOB: 11-18-1982],

Defendants.

#### No. 19-03028-01-05/07-09-CR-S-MDH

#### COUNT 1

21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(A)

NLT 10 Years Imprisonment

**NMT Life Imprisonment** 

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

#### **COUNTS 2-3 & 8**

21 U.S.C. § 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 Years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

# COUNTS 4-5, 12-13, & 19

21 U.S.C. § 841(a)(1) and (b)(1)(C)

NMT 20 Years Imprisonment

NMT \$1,000,000 Fine

NLT 3 Years Supervised Release

Class C Felony

# COUNTS 6, 11, 14, & 17

18 U.S.C. § 924(c)(1)(A)

NLT 5 Years Imprisonment

(Consecutive to All Counts)

NMT \$250,000 Fine

NMT 5 Years Supervised Release

Class A Felony

# **COUNTS 7, 10, & 20**

18 U.S.C. § 922(g)(3)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

#### COUNT 9

21 U.S.C. § 860a

NMT 20 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release (Consecutive to Counts 1 and 8) Class C Felony

#### **COUNTS 15 & 18**

18 U.S.C. § 922(g)(1) NMT 10 Years Imprisonment NMT \$250,000 Fine NMT 3 Years Supervised Release Class C Felony

#### **COUNT 16**

21 U.S.C. § 841(a)(1) and (b)(1)(A) NLT 10 Years Imprisonment NMT Life Imprisonment NMT \$10,000,000 Fine NLT 5 Years Supervised Release Class A Felony

# FORFEITURE ALLEGATION

21 U.S.C. § 853

\$100 Special Assessment (Each Count)

# SUPERSEDING INDICTMENT

#### THE GRAND JURY CHARGES THAT:

## COUNT 1

Beginning on an unknown date, but no later than May 14, 2017, and continuing through at least June 20, 2018, said dates being approximate, in Cass, Greene, and Miller Counties, in the Western District of Missouri, and elsewhere, the defendants, CHRISTINA E. GAUGER, PATRICK R. WATERS, ROBIN L. SELF, JAMES L. BROWN, KEITH D. BUTCHEE, JASON L. THOMAS, JORDAN H. WILLIAMSON, and BAYDON CHENNAULT, knowingly and intentionally conspired and agreed with one another and others, both known and unknown to the Grand Jury, to distribute 500 grams or more of a mixture or substance containing

a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1) and (b)(1)(A).

## **COUNT 2**

On or about July 27, 2017, in Greene County, in the Western District of Missouri, the defendant, **ROBIN L. SELF**, knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

# **COUNT 3**

On or about September 5, 2017, in Greene County, in the Western District of Missouri, the defendant, **CHRISTINA E. GAUGER**, knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

# COUNT 4

On or about September 8, 2017, in Greene County, in the Western District of Missouri, the defendant, **ROBIN L. SELF**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

#### COUNT 5

On or about January 11, 2018, in Greene County, in the Western District of Missouri, the defendant, **JAMES L. BROWN**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule

II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

# COUNT 6

On or about January 11, 2018, in Greene County, in the Western District of Missouri, the defendant, **JAMES L. BROWN**, knowingly possessed a firearm, that is, a Taurus brand, Millennium PT-111 Pro model, nine millimeter, semi-automatic pistol bearing serial number TBR34761, in furtherance of the offenses of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 1, and/or possession, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 5, in violation of Title 18, United States Code, Section 924(c)(1)(A).

## COUNT 7

On or about January 11, 2018, in Greene County, in the Western District of Missouri, the defendant, **JAMES L. BROWN**, being an unlawful user of controlled substances, that is, methamphetamine, and then knowing he was an unlawful user of controlled substances, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Taurus brand, Millennium PT-111 Pro model, nine millimeter, semi-automatic pistol bearing serial number TBR34761, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

#### **COUNT 8**

On or about January 17, 2018, in Greene County, in the Western District of Missouri, the defendant, **CHRISTINA E. GAUGER** and **PATRICK R. WATERS**, knowingly and intentionally possessed, with the intent to distribute, 50 grams or more of a mixture or substance

containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B).

## COUNT 9

On or about January 17, 2018, in Greene County, in the Western District of Missouri, the defendants, **CHRISTINA E. GAUGER** and **PATRICK R. WATERS**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, on premises in which an individual who was under the age of 18 years was present or resided, in violation of Title 21, United States Code, Section 860a.

#### COUNT 10

On or about January 17, 2018, in Greene County, in the Western District of Missouri, the defendant, **PATRICK R. WATERS**, being an unlawful user of controlled substances, that is, heroin, and then knowing he was an unlawful user of controlled substances, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Taurus model, PT22 brand, .22 caliber, semi-automatic pistol bearing serial number Z063043, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

#### **COUNT 11**

On or about January 17, 2018, in Greene County, in the Western District of Missouri, the defendant, **PATRICK R. WATERS**, knowingly possessed a firearm that is, a Taurus model, PT22 brand, .22 caliber, semi-automatic pistol bearing serial number Z063043, in furtherance of the offenses of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 1, and/or possession, with the intent to distribute, 50 grams or more of a mixture or substance containing a detectable amount of

methamphetamine as alleged in Count 8, in violation of Title 18, United States Code, Section 924(c)(1)(A).

## COUNT 12

On or about January 23, 2018, in Miller County, in the Western District of Missouri, the defendant, **JAMES L. BROWN**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

# **COUNT 13**

On or about January 26, 2018, in Greene County, in the Western District of Missouri, the defendant, **KEITH D. BUTCHEE**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

### COUNT 14

On or about January 26, 2018, in Greene County, in the Western District of Missouri, the defendant, **KEITH D. BUTCHEE**, knowingly possessed a firearm that is, that is, a Glock brand, 19 model, nine millimeter, semi-automatic pistol bearing serial number TD265; a Taurus brand, PT 809C model, nine millimeter, semi-automatic pistol bearing serial number TJZ12682; and a Taurus brand, PT-22 model, .22 caliber, semi-automatic pistol bearing a defaced serial number, in furtherance of the offenses of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 1, and/or possession, with the intent to distribute, a mixture or substance containing a detectable amount of

methamphetamine as alleged in Count 13, in violation of Title 18, United States Code, Section 924(c)(1)(A).

# COUNT 15

On or about January 26, 2018, in Greene County, in the Western District of Missouri, the defendant, **KEITH D. BUTCHEE**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and then knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Glock brand, 19 model, nine millimeter, semi-automatic pistol bearing serial number TD265; a Taurus brand, PT 809C model, nine millimeter, semi-automatic pistol bearing serial number TJZ12682; and a Taurus brand, PT-22 model, .22 caliber, semi-automatic pistol bearing a defaced serial number, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

#### **COUNT 16**

On or about March 14, 2018, in Greene County, in the Western District of Missouri, the defendant, **CHRISTINA E. GAUGER**, knowingly and intentionally possessed, with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(A).

#### COUNT 17

On or about March 14, 2018, in Greene County, in the Western District of Missouri, the defendant, **CHRISTINA E. GAUGER**, knowingly possessed a firearm that is, a Taurus brand, PT111 Millennium G2 model, nine millimeter, semi-automatic pistol bearing serial number TKN97572, and a Davis Industries brand, DM22 model, .22 caliber, Derringer handgun bearing

serial number 353830, in furtherance of the offenses of conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 1, and/or possession, with the intent to distribute, 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine as alleged in Count 16, in violation of Title 18, United States Code, Section 924(c)(1)(A).

# **COUNT 18**

On or about March 14, 2018, in Greene County, in the Western District of Missouri, the defendant, **BAYDON CHENNAULT**, having been convicted of a crime punishable by imprisonment for a term exceeding one year, and then knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Bersa brand, Thunder 380 CC model, .380-caliber, semi-automatic pistol bearing serial number C22889, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

# **COUNT 19**

On or about May 31, 2018, in Greene County, in the Western District of Missouri, the defendant, **ROBIN L. SELF**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

#### COUNT 20

On or about May 31, 2018, in Greene County, in the Western District of Missouri, the defendant, **PATRICK R. WATERS**, being an unlawful user of controlled substances, that is, heroin, and then knowing he was an unlawful user of controlled substances, did knowingly possess,

in and affecting interstate commerce, a firearm, to wit: a Taurus brand, PT706 model, nine millimeter, semi-automatic pistol bearing serial number TFP88229, which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2).

### **FORFEITURE ALLEGATION**

- 1. The allegations contained in Count 1 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.
- 2. Upon conviction of the controlled substance offense alleged in Count 1 of this Indictment, the defendants, CHRISTINA E. GAUGER, PATRICK R. WATERS, ROBIN L. SELF, JAMES L. BROWN, KEITH D. BUTCHEE, JASON L. THOMAS, JORDAN H. WILLIAMSON, and BAYDON CHENNAULT, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count 1 of this Indictment, including, but not limited to the following: all currency which were received during, involved in or used or intended to be used to facilitate the crimes alleged in Count 1 of this Indictment, as a money judgment, in that the property was involved in those offenses or is traceable to such property, in violation of Title 21, United States Code, Section 841(a)(1).

# SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

/s/ Katherine Bakesz

FOREPERSON OF THE GRAND JURY

/s/ Byron H. Black

**BYRON H. BLACK** 

Minnesota Bar No. 0395274 Assistant United States Attorney

DATED: <u>07/17/2019</u>

Springfield, Missouri